

(d) May purchase relocatable structures in installment transactions in which deferred installments of the purchase price are payable over *not more than 10 years from the date of delivery* of the property to the district and are secured by a security interest in the property. The transactions may take the form of, but are not limited to, lease-purchase agreements.

(e) May accept money or property donated for the use or benefit of the district and use the money or property for the purpose for which it was donated.

(7) The education service district board may adopt rules it considers necessary to carry out the duties of the board.

(8) The education service district may contract with public and private entities for service delivery.

(9)(a) The education service district shall work cooperatively with component school districts and review periodically with component school districts the operations of component school districts and shall submit to the component school districts plans for operations that achieve economies and efficiencies through consolidation of various operations of all or some of the districts. The education service district and its component school districts shall submit an annual report on the effectiveness of the consolidation of operations to the State Board of Education.

(b) As used in this subsection, "operations" means services involving transportation, payroll, student records, auditing, legal services, insurance, printing, investment and other similar services. [1965 c.100 §179; 1975 c.477 §6; 1977 c.56 §1; 1981 c.406 §1; 1983 c.133 §1; 1983 c.187 §3; 1985 c.457 §1; 1993 c.784 §11; 1995 c.333 §11; 1995 c.611 §12; 1997 c.600 §4; 2001 c.518 §5]



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## Step 1: Educational Service Agencies

State laws determine eligibility of Educational Service Agencies for Schools and Libraries Program support.

### Background

Educational Service Agencies (ESAs) in many states play key roles in the economic and efficient provision of a wide range of educational services to their component school districts. ESAs are known by a variety of names including Educational Service Units (ESUs), Local Educational Agencies (LEAs), and Board of Cooperative Educational Services (BOCES). This guidance will refer to all these types of entities as ESAs. Please see the [list of the ESAs in states that have requested eligibility determinations](#).

ESA services may include:

- Instructional-level services: Schools and programs (e.g., special education programs) that use services that may be eligible for discounts.
- Instructional support-level services: Staff and curriculum development services to their districts.
- Non-instructional-level services: Technology planning and implementation services and may also serve as service providers.

### Eligibility to Receive Support

Federal law defines an ESA as a "regional public multiservice agency authorized by State statute to develop, manage, and provide services or programs to local educational agencies." To determine whether an ESA is eligible to receive Schools and Libraries support as an applicant, FCC rules governing the program require USAC to determine whether the ESA provides elementary or secondary education as determined under state law. USAC determines whether the entity provides elementary or secondary education to its student population and whether the ESA facility is eligible for support because elementary or secondary education, as defined in state law, is provided at that facility. FCC rules do not specifically define or address ESAs.

USAC conducts a biennial survey of states and territories to determine whether ESAs are eligible to receive funding. State and territory officials are asked to describe the programs served by ESAs and whether ESAs operate facilities that they either own or lease that contain classrooms. The officials are asked to provide legal support for the information they supply and to certify the accuracy of their determinations. The [Eligibility Table for Educational Service Agencies](#) includes the most recent information provided by the states and territories.

### Potential Conflict Among Functions Performed by ESAs in the Schools and Libraries Process

## Step 1: Determine Eligibility

### Eligibility Requirements

### Non-traditional Elementary and Secondary Education

### Educational Service Agencies

### Eligibility Table for ESAs

ESAs may perform as many as four roles in the Schools and Libraries Program:

- ESAs are applicants for program discounts.
- ESAs provide program consulting assistance to their component districts.
- ESAs review and approve district Technology Plans.
- In some instances, ESAs are service providers of eligible services.

When ESAs function as service providers, two potential conflicts may raise concerns:

- In some states, state law or regulation permits school districts to select services provided by ESAs on a non-competitive basis.
- Some states provide subsidies so that ESAs may provide discounted rates to public schools.

These roles raise potential conflict of interest issues, primarily with respect to complying with the FCC's competitive bidding requirements, and assuring that ESAs with the dual roles of providing Technology Plan development services and approving Technology Plans are not compromising the Technology Plan process.

#### ***Guidelines for Compliance with FCC Rules and Avoiding Conflicts of Interest***

##### **ESAs that Do Not Provide Eligible Services**

- An ESA that does not serve as a service provider may assume the function of an applicant in filing the *Description of Services Requested and Certification Form* (Form 470), evaluating bids, filing the *Services Ordered and Certification Form* (Form 471) applications, and obtaining discounts for services for itself (if it is an eligible recipient of discounted services) and its component districts.
- An ESA that does not function as a service provider may assume the function of a consultant to its component districts in developing Technology Plans, consulting with the component districts as to their service and equipment requirements, and helping its component districts apply for and administer the receipt of discounts.
- An ESA that does not function as a service provider may approve Technology Plans (if it is a USAC-approved Technology Plan Approver. However, an ESA that has played a significant role in developing a Technology Plan as a consultant may approve that Technology Plan only if the ESA can assure USAC, and provide documentation supporting its assurance, that the ESA maintains a review and approval process independent of the Technology Plan development role.

In determining whether the ESA's role is "significant," USAC would consider, but not be limited to, the following: (i) whether the ESA developed and wrote the Technology Plan; and (ii) whether the ESA provided advice about the content of the Technology Plan that was substantially incorporated in the plan.

##### **ESAs that Provide Eligible Services**

Fundamental requirements of the Schools and Libraries program include that applicants select service providers through a fair and open competitive process, that the most cost-effective bid for services or equipment is selected with price being the primary factor considered, and that the alternative selected is the most cost-effective means of meeting educational needs and technology plan goals.

A potential conflict may arise when an ESA is a service provider and also an applicant, a consultant to school districts, or a Technology Plan approver. The potential conflict is that the selection of the service provider may not be fair and open but may, in fact, provide an unfair advantage to the ESA as service provider.

The potential conflict may be resolved if:

The ESA provides only one category of eligible services (telecommunications service, Internet access, internal connections other than basic maintenance, or basic maintenance of internal connections), *and* is functioning in its non-service provider role(s) (e.g., applicant, consultant, technology plan approver) only with respect to separate applications for other categories of services

Examples include, but are not limited to the following: (i) an ESA cannot be both an applicant and a service provider on the same application; (ii) an ESA that is a consultant to an applicant for a particular application cannot also be a service provider on that application; (iii) an ESA that provides consulting services to develop and/or approves the applicant's Technology Plan cannot be a service provider on the applications that rely on that Technology Plan.

The ESA is large enough to provide organizational and functional separation between staff acting as service providers and staff providing technology plan support and application and administration assistance. However, the ESA must be prepared to clearly show the separation of functions to USAC with appropriate documentation. Examples of such documentation include organizational flow charts, budgetary codes, and supervisory administration.

#### Other Potential Concerns

Even if state procurement rules permit public school districts to select an ESA's services on a non-competitive basis, FCC rules require that applicants for services must use competitive bidding for eligible services. The FCC competitive bidding requirements must be met to be eligible for discounts. These requirements include:

- Posting on USAC's website a *Description of Services Requested and Certification Form* (FCC Form 470)
- Fair and open consideration of all resulting proposals, whether in response to a Request for Proposal (RFP) or to an FCC Form 470, and
- Selecting the most cost-effective bid with price being the primary factor.

Some states provide off-setting aid payments to public school districts that have the effect of reducing some ESA charges for equipment and services eligible for discounts. If an ESA is acting as a service provider, any state reductions must be applied AFTER the discount is applied. The evaluation of alternatives must include price without discounts as the primary factor. It does not violate FCC rules to include another factor (weighted less heavily than the non-discounted price) relating to the availability of discounts from other sources for particular alternatives.

Finally, since ESAs may be both applicants and service providers on separate applications, discounts **cannot** be paid twice for the same service. If an ESA is serving as an Internet service provider to its districts and the districts are seeking discounts on that Internet access, the ESA cannot also seek discounts as a consortium leader for those services from the underlying providers.

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## Step 2 Develop a Technology Plan

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### Step 1: Eligibility Table for Educational Service Agencies (ESAs)

The table below provides information on eligibility of Educational Service Agencies for Schools and Libraries support, as determined in state law.

#### Step 1: Determine Eligibility

Eligibility Requirements

Non-traditional Elementary and Secondary Education

Educational Service Agencies

Eligibility Table for ESAs

Eligibility Table for Educational Service Agencies (ESAs)			
(Revised 12/6/2005)			
State	ESA Authorized by State	ESA Eligible for USF Support	State ESA Terminology
Alabama	No	No	
Alaska	Yes	Yes	Special Education Service Agencies; Regional Resource Centers
American Samoa	No	No	
Arizona	Yes	Yes	Office of County School Superintendent
Arkansas	Yes	Yes	Education Service Cooperative (ESC)
California	Yes	Yes	County Office of Education (COE)
CNMI Northern Marianas	No	No	
Colorado	No	No	
Connecticut	Yes	Yes	Regional Educational Service Center (RESC)
Delaware	No	No	
District of Columbia	No	No	
Florida	Yes	Yes	Educational Consortium; Learning Alliance
Georgia	Yes	No	Regional Educational Service Agency (RESA)
Guam	No	No	

Hawaii	No	No	
Idaho	No	No	
Illinois	Yes	Yes	Regional Office of Education; Intermediate Service Center
Indiana	Yes	Yes	Interlocal Cooperative; Special Education Cooperative; Educational Service Center
Iowa	Yes	Yes	Area Education Agency
Kansas	Yes	Yes	Interlocal Cooperative
Kentucky	No	No	
Louisiana	Yes	Yes	Special School District
Maine	No	No	
Maryland	No	No	
Massachusetts	Yes	Yes	Educational Collaborative
Michigan	Yes	Yes	Intermediate School District
Minnesota	Yes	Yes	Service Cooperative; Intermediate District; Education District
Mississippi	Yes	Yes	Regional Education Service Agencies
Missouri	No	No	
Montana	No	No	
Nebraska	Yes	Yes	Educational Service Unit
Nevada	No	No	
New Hampshire	No	No	
New Jersey	Yes	Do not qualify as a school; might qualify as a library	Educational Information and Resource Center
New Mexico	Yes	Yes	Local Education Agency (LEA). "State Institutions" identified in State Statutes: <ul style="list-style-type: none"><li>• NM Military Institute</li><li>• NM School for the Visually Handicapped</li><li>• NM School for the Deaf</li><li>• NM Boys' School</li><li>• NM Youth Diagnostic and Development Center</li></ul>

			<ul style="list-style-type: none"> <li>• Los Lunas Medical Center</li> <li>• Fort Stanton Hospital</li> <li>• Las Vegas Medical Center</li> <li>• Carrie Tingley Crippled Children's Hospital</li> </ul>
New York	Yes	Yes	Board of Cooperative Educational Services (BOCES)
North Carolina	No	No	
North Dakota	No	No	
Ohio	Yes	Yes	Educational Service Center
Oklahoma	No	No	
Oregon	Yes	Yes	Educational Service District
Pennsylvania	Yes	Yes	Intermediate Unit
Puerto Rico	No	No	
Rhode Island	Yes	Yes	Collaborative
South Carolina	No	No	
South Dakota	Yes	Yes	
Tennessee	No	No	
Texas	Yes	Yes	Regional Educational Service Center
US Virgin Islands	No	No	
Utah	Yes	No	Regional Service Center
Vermont	No	No	
Virginia	No	No	
Washington	Yes	Yes	Educational Service District
West Virginia	No	No	
Wisconsin	Yes	Yes	Cooperative Educational Service Agency
Wyoming	No	No	

## Step 2 Develop a Technology Plan

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## Schools and Libraries



## USAC's Schools and Libraries News Brief December 22, 2005

### Funding Year 2005 Waves

USAC will release Wave 26 funding commitment letters on December 27.

### Funding Year 2006 Eligible Services List

The FCC has released the FY2006 Eligible Services List. You should use this list for all funding requests for FY2006. You can view the full list in [PDF](#) format on the USAC website or use the [Searchable Interface](#) to locate a specific entry.

The list is organized in six sections:

- Telecommunications Services
- Internet Access
- Internal Connections
- Basic Maintenance
- Miscellaneous
- Special Eligibility Conditions

The first four sections match the four categories of service under which applicants can apply for discounts. The "Miscellaneous" section contains additional clarifications on certain products and services and the "Special Eligibility Conditions" section provides specific details on terms used in the first four sections that involve the determinations of eligibility for discounts.

For a summary of changes from the FY2005 Eligible Services List, see the FCC's [Public Notice 05-197](#) of November 22, 2005. The most significant changes are as follows:

1. **"Basic and Reasonable Security Protections"** such as firewalls, gateways, proxy servers and virtual private network (VPN) components are eligible. Intrusion protection, anti-virus software, security appliances or related components are NOT eligible.
2. **Wireless Internet Access** — Portable devices such as cell phones or handheld email messaging units that provide Internet access are only eligible if the school or library has an auditable means of distinguishing between eligible and ineligible uses.
3. **Wide Area Networks** — Services that contain on-premise Priority One equipment may have one demarcation per service. For example, a network that includes data, voice and video can now have 3 demarcations—one for each service.
4. **Administrative charges** above and beyond the universal service charge — including third-party fees to administer the universal service charge — are NOT eligible.

# USAC

Universal Service Administrative Company  
2000 L Street, NW, Suite 200  
Washington, DC 20036  
[www.universalservice.org](http://www.universalservice.org)

### Letters of Agency for Consortia

A consortium Letter of Agency (LOA) is signed by a consortium member and is kept on file by the consortium leader to verify the member's knowledge of membership and participation in the consortium. The LOA establishes the relationship between the authorized person who signs a program form and each recipient of services listed on that form.

Consortium LOAs must be signed before the Form 471 certification date and, at a minimum, must feature the following information:

- Consortium leader's name
- Consortium member's name
- Timeframe (e.g., FY2006 - 2008)
- Signature, signature date, and title of the person signing the LOA
- Description of services covered

The description of services can be as general as "all E-rate eligible services" or it can be more restrictive (e.g., "basic telephone service only").

See the [Reference Area](#) document on [Letters of Agency](#) for more details.

### Tip of the Week: Check Your Form 471 RAL

Receipt Acknowledgment Letters (RALs) for FY2006 Forms 471 will be issued beginning this week. Check carefully to verify that the information on your RAL is correct.

You may download and print copies of [Schools and Libraries News Briefs](#) on USAC's website. You may [subscribe](#) to or [unsubscribe](#) from this news brief. For program information, please visit the [Schools and Libraries](#) area of the USAC website, [submit a question](#), or call us toll-free at 1-888-203-8100. Feel free to forward this news brief to any interested parties.



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## SPIN

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## Letters of Agency

The authorized person on the Form 471 — the person whose signature appears in the Form 471 Item 34 — certifies that he or she is the person authorized to submit and certify to the accuracy of the application. This person must be authorized to represent any and all of the entities for which discounts are sought in the funding requests featured on the application. During its review of the Form 471, the SLD may require copies of the documentation that confirms this person's authorization to represent all of the entities featured on the Form 471.

The evidence that establishes this authorization — and therefore, that establishes the relationship between the authorized person and the entities featured on the form — is generally a Letter of Agency (LOA). A Letter of Agency (LOA) is most commonly signed by consortium members and kept on file by their consortium leader to verify their knowledge of their membership and participation in the consortium. Other vehicles to establish this authorization could be a project agreement, a contract, a letter agreement, or other similar document.

A consultant — or anyone signing as the authorized person who is not a school or library employee — should also have an LOA from the applicant expressly authorizing the consultant to represent the applicant.

Whatever the form of the document establishing the above authorization, it must contain all of the following:

- ▶ The name of the person filing the application (the consortium leader or consultant)
- ▶ The name of the person authorizing the filing of the application (the entity who will receive discounted services, such as a consortium member)
- ▶ The specific timeframe the LOA or authorizing document covers (for example, the E-rate Funding Year 2003)
- ▶ The signature, signature date, and title of an official who is an employee of the entity who is authorizing the filing of the application (the entity who will receive discounted services, such as a consortium member)
- ▶ The type of services covered by the LOA or authorizing document (such as "Internet services" or "networking equipment").

NOTE: The timeframes of these authorizations cannot be open-ended, such as "until terminated by either party."



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## CONSORTIUM MEMBER'S LETTERHEAD

Addressed To Consortium

Re: Letter of Agency For Funding Year 200\_ - 200\_

This is to confirm our participation in the [name of Consortium] E-rate Consortium for the procurement of [List Services]. I hereby authorize [name of Consortium] to submit FCC Form 470, FCC Form 471, and other E-rate forms to the Schools and Libraries Division of the Universal Service Administrative Company on behalf of the [Insert Entity Name].

I understand that, in submitting these forms on our behalf, you are making certifications for [Insert Entity Name]. By signing this Letter of Agency, I make the following certifications:

- (a) [USE FOR SCHOOL RELATED LOA] I certify that [our school, schools in our district] are all schools under the statutory definitions of elementary and secondary schools found in the No Child Left Behind Act of 2001, 20 U.S.C. §§ 7801(18) and (38), that do not operate as for-profit businesses and do not have endowments exceeding \$50 million.

[USE FOR LIBRARY RELATED LOA] I certify that [our library, libraries in our system] are eligible for assistance from a State Library Administrative Agency under the Library Services and Technology Act of 1996, Pub. L. No. 104-208, § 211 et seq., 110 Stat. 3009 (1996) that do not operate as for-profit businesses and whose budgets are completely separate from any school (including, but not limited to elementary, secondary schools, colleges, or universities).

- (b) I certify that our [Insert Type of Entity (e.g. school, school district(s), library(ies))] has/have secured access, separately or through this program, to all of the resources, including computers, training, software, internal connections, maintenance, and electrical capacity, necessary to use the services purchased effectively. I recognize that some of the aforementioned resources are not eligible for support. I certify that to the extent that the Billed Entity is passing through the non-discounted charges for the services requested under this Letter of Agency, that the entities I represent have secured access to all of the resources to pay the non-discounted charges for eligible services from funds to which access has been secured in the current funding year.
- (c) I certify that our [Insert Type of Entity (e.g. school, school district(s), library(ies))] is/are covered by a technology plan(s) that is written, that covers all 12 months of the funding year, and that has been or will be approved by a state or other authorized body, or an SLD-certified technology plan approver, prior to the commencement of service. The plan(s) is written at the following level(s):

\_\_\_\_\_ an individual technology plan for using the services requested in this application; and/or

\_\_\_\_\_ higher-level technology plan(s) for using the services requested in this application; or

\_\_\_\_\_ no technology plan needed; applying for basic local, cellular, PCS, and/or long distance telephone service and/or voice mail only.

- (d) I certify that the services the school, library or district purchases at discounts provided by 47 U.S.C. § 254 will be used solely for educational purposes and will not be sold, resold, or transferred in consideration for money or any other thing of value, except as permitted by the rules of the Federal Communications Commission (Commission or FCC) at 47 C.F.R. § 54.500(et seq.).
- (e) I certify that our [Insert Type of Entity (e.g. school, school district(s), library(ies))] has complied with all program rules and I acknowledge that failure to do so may result in denial of discount funding and/or cancellation of funding commitments. I acknowledge that failure to comply with program rules could result in civil or criminal prosecution by the appropriate law enforcement authorities.
- (f) I acknowledge that the discount level used for shared services is conditional, for future years, upon ensuring that the most disadvantaged schools and libraries that are treated as sharing in the service, receive an appropriate share of benefits from those services.

- (g) I certify that I will retain required documents for a period of at least five years after the last day of service delivered. I certify that I will retain all documents necessary to demonstrate compliance with the statute and Commission rules regarding the application for, receipt of, and delivery of services receiving schools and libraries discounts, and that if audited, I will make such records available to the Administrator. I acknowledge that I may be audited pursuant to participation in the schools and libraries program.
- (h) I certify that I am authorized to order telecommunications and other supported services for the eligible entity(ies) covered by this Letter of Agency. I certify that I am authorized to make this request on behalf of the eligible entity(ies) covered by this Letter of Agency, that I have examined this Letter, that all of the information on this Letter is true and correct to the best of my knowledge, that the entities that will be receiving discounted services under this Letter pursuant to this application have complied with the terms, conditions and purposes of the program, that no kickbacks were paid to anyone and that false statements on this form can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act.
- (i) I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I will institute reasonable measures to be informed, and will notify USAC should I be informed or become aware that I or any of the entities, or any person associated in any way with my entity and/or the entities, is convicted of a criminal violation or held civilly liable for acts arising from their participation in the schools and libraries support mechanism.
- (j) I certify, on behalf of the entities covered by this Letter of Agency, that any funding requests for internal connections services, except basic maintenance services, applied for in the resulting FCC Form 471 application are not in violation of the Commission requirement that eligible entities are not eligible for such support more than twice every five funding years beginning with Funding Year 2005 as required by the Commission's rules at 47 C.F.R. § 54.506(c).
- (k) I certify that, to the best of my knowledge, the non-discount portion of the costs for eligible services will not be paid by the service provider. I acknowledge that the provision, by the provider of a supported service, of free services or products unrelated to the supported service or product constitutes a rebate of some or all of the cost of the supported services.
- (l) I certify that I am authorized to sign this Letter of Agency and, to the best of my knowledge, information, and belief, all information provided to [name of Consortium] for E-rate submission is true.

Name of  
Entity

Date: \_\_\_\_\_ 200 \_\_\_\_\_

Signature \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_



**USAC**

# **AVOIDING COMMON PIA ERRORS**

**Catriona Ayer**

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**Train-the-Trainer Workshop  
September 9-10, 2002  
Schools & Libraries Division**



# **READ THE INSTRUCTIONS**

Instructions are available on the web,  
and through Client Service Bureau

# What Went Wrong (FY 2001)

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- ◆ Most common denial reasons (total FRNs)
  - Ineligible entities receiving service (7%)
  - Insufficient support resources (4%)
  - Insufficient documentation (4%)
  - Ineligible products or services (3%)
  - Form 470 not certified (3%)
  - 28-day waiting period violated (2%)

# What Went Wrong (FY 2001)

---

- ◆ Most common denial reasons (by dollars)
  - Insufficient Support Resources (7%)
  - Ineligible Services or Products (3%)
  - 470 Not Certified (2%)
  - Applicant Not Eligible to Apply (2%)
  - Ineligible Entities Receiving Services (1%)
  - Insufficient Documentation (1%)

# What Went Wrong (FY 2002)

---

- ◆ Complete picture not yet available
- ◆ However, current list shows:
  - Ineligible Services and Products
  - Form 470 Not Certified
  - Ineligible Entities Receiving Services
  - Insufficient Documentation



# Other Reasons for Denial

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- ◆ Less common reasons for denial include:
  - Ineligible Telecommunications Provider
  - Ineligible Use
  - 470 Not Filed
  - Services Not Requested on Form 470
  - Competitive Bidding Violations